

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Gillman & Gillman, LLC  
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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Nereida E. Alvarez  
Miguel A. Perez

Case No.: 17-28432 MBK

Judge: MBK

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Lakeview Loan Servicing LLC, creditor,

A hearing has been scheduled for February 20, 2018, at 10:00 AM.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☒ Payments have been made in the amount of \$ \$2,161.46, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Above payment is held due to pending motion and recent receipt of payment address. Children living in household have minor infant children and debtor was addressing expenses. Prior to filing, Wife was without income in summer months and, at time of filing, had resumed employment but had significant expenses immediately after filing.

☒ Other (**explain your answer**):

Debtor is prepared to resume and continue timely payments and address arrears. Debtor has filed Motion for LMP for loan modification and will timely pursue application.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 2/7/2018

/s/ Nereida E. Alvarez  
Debtor's Signature

Date: 2/7/2018

/s/ Miguel A. Perez  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.